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June 29, 2020

Via Overnight Mail
Hon. Phillip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: *Patemian v. City of White Plains*
Index No. 17 CV 6156

Your Honor:

Enclosed herewith is a courtesy copy of the parties' Proposed Joint Pretrial Order in the above referenced matter.

Additionally, the parties have conferred regarding the potential conference with the Court in the event the parties are not able to resolve their discovery dispute. Unfortunately, counsel are unavailable on the date proposed by the Court (July 14). The parties have conferred and July 17, 2020 is available for all parties at any time.

Finally, the parties jointly request that the time for filing joint jury instructions and a verdict form be extended to thirty days before trial. Given the standing order from the Southern District suspending all civil trials, we believe that such an extension would better conform to the eventual trial date. Thank you for your consideration of this request.

Very truly yours,

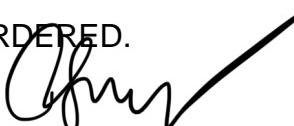
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s/Randolph M. McLaughlin
Randolph M. McLaughlin
Debra S. Cohen

The telephonic pre-motion conference scheduled for July 14, 2020 is adjourned until July 17, 2020 at 12:00 p.m. The parties shall inform the Court by July 14, 2020 if the conference is necessary to resolve the parties' dispute. Additionally, the parties' request for an extension of time to file joint jury instructions and a verdict form is granted. The parties shall file these documents by August 31, 2020.

Dated: New York, NY
July 6, 2020

SO ORDERED.


Philip P. Halpern, U.S.D.J.